CITY OF

PORTLAND, OREGON

PORTLAND WATER BUREAU

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June 25, 2010

FCC Secretary Marlene H. Dortch, Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: Office of Engineering and Technology Requests Information on Use of 1675-1710 MHz Band, ET Docket No. 10-123

Dear Secretary Dortch:

On behalf of the Portland Water Bureau, I am writing in response to the FCC's request for information on the use of the 1675-1710 MHz Band. Portland strongly recommends that the FCC reserve and preserve its current use for transmission of USGS stream gauge data, NOAA national weather satellite service data and other weather and water information that is critical for our water system which serves over 830,000 people. We are in support of the details outlined in the June 24, 2010 letter sent to the FCC by the Association of Metropolitan Water Agencies signed by Diane VanDe Hei.

Specifically, for the Portland water system and many of the others in the Portland metropolitan area, the access to USGS stream gauge information is critical to:

1) Portland's summer supply planning process as it estimates on a daily basis the inflows to the surface water supply reservoirs during the summer season which allows the agency to manage its surface water source conjunctively with its supplemental groundwater supplies.
2) Portland utilizes the stream gauging system in the winter to keep track of the impacts of rain and snow events on the city's unfiltered surface water source. The immediacy of this need is vital to maintaining water service to customers during high discharge events as well as to assess any potential for damage to the entire water system or facilities due to flooding.
3) Portland monitors in-stream flows to manage downstream water releases in support of federally listed threatened fish as a part of the requirements of an Incidental Take Permit from the National Marine Fisheries Service. We also utilize telemetry from two temperature monitoring sites for compliance with the HCP requirements for summer fish habitat.
4) Stream gauging records are an important part of Portland's water supply planning, and for its climate change planning and monitoring of changing climate patterns. Keeping these consistent in methodology is an important aspect of this work. Without consistency in gauged records the data used in this planning becomes less reliable.
5) Within our surface water systems there are eight stream flow gages, four of which also report water quality and temperature of the water flowing into our primary storage reservoirs. Three lake level gages for our primary storage reservoirs, which allow us to

measure the volume of water we have in storage and are also required for compliance with FERC requirements for the two hydro plants & dams.

In addition to the USGS stream gauge data, Portland utilizes satellite images from the National Weather Service or Emergency Managers Weather Information Network (EMWIN). Portland is concerned that moving or reducing the ability for these services to use the GOES DCS would negatively impact the city's ability to protect the health and welfare of our customers during emergencies.

In summary, the Portland Water Bureau recommends that the 1675-1710 MHz frequencies remain available for use by the United States Geological Survey to perform the agency's critical data transmission services. Local governments and the public need the federal government to maintain its bandwidth and satellites to continue providing the critical data necessary for managing the nation's water resources for the benefit of society.

Sincerely,

Edward Campbell
Resource Protection and Planning Director

Cc: Erica Brown, AMWA
David Behar, Water Utility Climate Alliance
Phil Ward, Oregon Water Resources Department